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**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK**

----- X
IN RE: : Chapter 11

NATIONAL AIR CARGO, INC., :
Debtor : Case No. 14-12414-MJK
----- X

**STIPULATION AND ORDER REGARDING LIFTING
THE AUTOMATIC STAY TO ALLOW APPEAL TO PROCEED**

WHEREAS on or about October 28, 2013, a money judgment was entered in favor of Global BTG LLC ("Global") as against National Air Cargo, Inc. ("NAC" of the "Debtor") in the United States District Court for the Central District of California (the "Trial Court") for the sum of \$8,000,000.00 million in damages, plus interest and costs (the "Judgment");

WHEREAS on or about April 9, 2014, National filed a Notice of Appeal with the United States Court of Appeals for the Ninth Circuit, Case No. 14-55574 (the "Appeal");

WHEREAS on or about April 24, 2014, the Trial Court entered an Amended Judgment in accordance with its March 10, 2014 post-trial motions order, awarding to Global \$8,000,000.00 million in compensatory damages, \$1,927,232.20 in pre-judgment interest, plus post-judgment interest and costs;

WHEREAS on or about April 30, 2014, National filed an Amended Notice of Appeal ("Amended Appeal");

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WHEREAS on or about September 15, 2014, National filed its opening appellate brief;

WHEREAS Global's responding brief is currently due on November 14, 2014;

WHEREAS NAC filed a voluntary petition for relief under Title 11, Chapter 11 of the United States Bankruptcy Code on October 17, 2014 in the above captioned proceeding thereby invoking the provisions of 11 U.S.C. §362(a) (the "Automatic Stay") in the above captioned proceeding.;

WHEREAS National filed a Suggestion of Bankruptcy with the District Court on October 20, 2014;

WHEREAS to the extent that the Automatic Stay may be implicated with respect to the Debtor's Appeal and Amended Appeal, Global and the Debtor are desirous of having the Appeal and Amended Appeal prosecuted, notwithstanding NAC's Chapter 11 proceeding.

NOW, THEREFORE, the Debtor and Global ("Parties") stipulate that:

1. To the extent applicable, the Parties hereby stipulate to the entry of an order, in "so ordered" fashion modifying the provisions of the Automatic Stay thereby permitting the Appeal and Amended Appeal to proceed in all respects, including without limitation; the filing of all briefs, reply briefs, sur-reply briefs, motions, the presentation of oral arguments, petitions for rehearing, petitions certiorari all in respect thereof.

Dated: New York, New York
November 13, 2014

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IT IS SO ORDERED:

Michael J. Kaplan
United States Bankruptcy Judge
November __, 2014